

WALTER E. CLARK, III,)
)
Plaintiff,)
)
v.) Civil Action No. 3:23-cv-00095
)
ELECTRIC POWER BOARD OF)
METROPOLITAN NASHVILLE AND)
DAVIDSON COUNTY d/b/a NASHVILLE)
ELECTRIC SERVICE,)
)
Defendant.)

Plaintiff Walter Clark (“Plaintiff”) and Defendant Electric Power Board of Metropolitan Nashville and Davidson County d/b/a Nashville Electric Service (“Defendant”) jointly move this Court for an Order amending the Case Management Order to extend the deadline to conduct fact witness depositions until February 9, 2024 and state as follows:

1. The current deadline to complete all discovery is December 15, 2023.
2. The Parties have engaged in written discovery.
3. The Parties have cooperated in attempting to schedule the depositions of fact witnesses but due to conflicts will not be able to conduct all depositions of fact witnesses by the current deadline.
4. The Parties have conferred through their counsel and anticipate all depositions of fact witnesses can be concluded by February 9, 2023.
5. Extending the current deadline to conduct the depositions of fact witnesses will not impact any other deadlines included in the current Case Management Order, including but not

limited to the March 29, 2024 deadline to file dispositive motions, or the trial of this matter scheduled to begin on August 27, 2024.

WHEREFORE, the Parties respectfully request that the Court enter an Order modifying the current Case Management Order to extend the deadline for the Parties to conduct the depositions of fact witnesses until February 9, 2024.

Respectfully submitted this 17th day of November, 2023.

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CERTIFICATE OF SERVICE

I certify that on the 17th day of November, 2023, a copy of the foregoing document **JOINT MOTION TO EXTEND DEADLINE TO CONDUCT FACT WITNESS DEPOSITIONS** was furnished to the below individuals via the court's electronic filing system and or/ electronic mail.

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